

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TYRONE JONES,

Plaintiff,

v.

KIMBERLY COLEMAN,

Defendant.

No. 08-cv-00755

**MOTION FOR LEAVE TO ISSUE LIMITED DISCOVERY TO THE ILLINOIS
DEPARTMENT OF CORRECTIONS**

NOW COMES the Plaintiff, TYRONE JONES, by and through his attorneys, HORWITZ, RICHARDSON & BAKER, and hereby moves this Honorable Court to grant his motion to issue limited discovery to the Illinois Department of Corrections ("IDOC") in an effort to ascertain the contact information of the Defendant so that she may be located and served. In support of said motion, the Plaintiff states as follows:

1. Plaintiff alleges that the Defendant, his parole officer, intentionally misrepresented to the parole board that he failed to comply with the terms and conditions of his parole. As a result of the Defendant's lie, the Plaintiff was sent to prison on May 9, 2006 and kept in there for violating his parole. Plaintiff was wrongfully held in prison for approximately 72 days until he went before the parole board and was released.

2. The Plaintiff has expended considerable time and effort in attempting to locate and serve Defendant Kimberly Coleman. In that regard, the Plaintiff has taken the following actions:

- a. Contacted an investigator to skip trace Defendant Coleman;
- b. Telephonically contacted the IDOC Chicago Office to ascertain the location of Defendant Coleman;
- c. Telephonically contacted the Cook County Sheriff's Department to ascertain the location of Defendant Coleman;
- d. Telephonically contacted the Menard County Sheriff's Department to ascertain the location of Defendant Coleman; and
- e. Telephonically contacted the IDOC Springfield Office.

3. Despite these efforts, Plaintiff was unable to obtain any contact information for Defendant Coleman.

4. As a last resort, Plaintiff has filed this good-faith motion seeking leave to propound limited discovery upon the IDOC. Specifically, Plaintiff seeks to issue a subpoena to the IDOC requesting any and all documentation related to Kimberly Coleman during the years 2004 - 2007. (See Subpoena, attached hereto as Exhibit 1.)

5. As stated above, this motion is brought in good-faith. Plaintiff has exhausted all other resources to ascertain the location of Defendant Coleman and have her served within the 120-day period pursuant to Rule 4(m).

WHEREFORE, the Plaintiff, TYRONE JONES, respectfully requests this Honorable Court grant this motion and permit him leave to issue limited discovery to IDOC and for any further relief this Honorable Court deems fair and just.

Respectfully submitted,

/s/ Rachelle M. Sorg
One of Plaintiff's Attorneys

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